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By ECF

February 15, 2022

The Hon. P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Statoil (Nigeria) Limited and Texaco Nigeria Outer Shelf Limited v. Nigerian National Petroleum Corporation*, Case No. 18-cv-02392

Dear Judge Castel:

We represent Petitioners Statoil (Nigeria) Limited and Texaco Nigeria Outer Shelf Limited (together, **Petitioners**) in the above-captioned action. We write jointly with Respondent Nigerian National Petroleum Corporation (**NNPC**, and together with Petitioners, the **Parties**) in response to the Court's Order dated February 1, 2022, ECF No. 88 (the **Order**). The parties have conferred and respond as follows to the Court's inquiries.¹

Neither Petitioners nor NNPC has made, or intends to make, any application regarding matters addressed in R. Krajick's January 28, 2022 letter, ECF No. 87.

The Parties confirm that the pending Motion to Dismiss, ECF No. 50, is fully submitted and there are no other pending applications or motions before the Court. The Amended Petition filed by Petitioners on January 28, 2020, ECF No. 40, remains Petitioners' operative pleading and it is to that pleading that NNPC's Motion to Dismiss, filed on February 18, 2020, ECF No. 50, is directed. The document filed on June 18, 2020, as ECF No. 78, is the unredacted version of the Amended Petition that Petitioners previously filed in redacted form on January 28, 2020. The Parties would be happy to submit courtesy copies of the operative papers to Chambers if this would assist the Court.

We thank the Court for its time and consideration.

¹ No court conference is currently scheduled in this action.



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Respectfully submitted,

s/ Timothy P. Harkness

Timothy P. Harkness

cc: All Counsel of Record (via ECF)